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8 Attorneys for Defendant,  
*Albertson's LLC*

9 **UNITED STATES DISTRICT COURT**  
10 **DISTRICT OF NEVADA**

VCF

11 KELLY DENINO, an Individual, )  
12 )

2:19-cv-00540-JAD-JCF

13 Plaintiffs, )

14 vs. )

**ERRATA TO STIPULATION AND ORDER TO  
EXTEND DISCOVERY DEADLINES**

15 ALBERTSON'S LLC, a foreign limited )  
16 liability company; DOE GENERAL )  
17 MANAGER, an individual; DOES I-X; and )  
18 ROE BUSINESS ENTITIES XI-XX, )  
inclusive, )

**(First Request)**

19 Defendants. )  
20 )

21 **COMES NOW**, Plaintiff KELLY DENINO, by and through her counsel CLAGGETT &  
22 SYKES LAW FIRM and, and ALBERTSON'S LLC, by and through its counsel BACKUS, CARRANZA  
23 & BURDEN, hereby stipulate to the extension of all discovery deadlines by ninety (90) days. The  
24 Parties propose the following discovery plan:

25 **DISCOVERY COMPLETED TO DATE**

26 The Parties have attended the mandatory FRCP 26 conference and exchanged initial  
27 disclosures of documents and individuals with knowledge of the facts pertaining to the claims set  
28 forth in this matter; including supplements thereto. The Parties have also propounded written

discovery requests, including interrogatories, requests for production, and requests for admission.

### **DISCOVERY TO BE COMPLETED**

The Parties seek to disclose liability and damages experts; taking depositions of the same. Further, Defendant seeks to depose Plaintiff, her medical providers and identified percipient witnesses. Plaintiff seeks to depose Defendant's FRCP 30(b)(6) witness and identified percipient witnesses.

### **REASONS FOR EXTENSION TO COMPETE DISCOVERY**

Despite the good faith efforts of the parties to comply with the Court's discovery deadlines, both Parties have scheduling conflicts and need additional time for additional medical records and expert designations. This request is made in good faith; not for the purpose of delay.

### **PROPOSED NEW DISCOVERY DEADLINES**

#### **Expert Disclosure Deadline:**

Currently: August 26, 2019

**Proposed: November 25, 2019**

#### **Interim Status Report:**

Currently: August 26, 2019

**Proposed: November 25, 2019**

#### **Rebuttal Expert Disclosure Deadline:**

Currently: September 25, 2019

**Proposed: December 26, 2019**

#### **Discovery Deadline:**

Currently: October 25, 2019

**Proposed: January 27, 2020**

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**Deadline to File Dispositive Motions:**

Currently: November 22, 2019

**Proposed: February 28, 2019**

**Pre-Trial Order Deadline:**

2020

Currently: December 20, ~~2019~~

**Proposed: March 19, 2020**

If dispositive motions are filed, the deadline for filing the joint pretrial order will be suspended until 30 days after decision on the dispositive motions or further court order.

DATED: this 5th day of August, 2019

DATED: this 5th day of August, 2019

**CLAGGETT & SYKES LAW FIRM**

**BACKUS, CARRANZA & BURDEN**

By: /s/ Sean K. Claggett

By: /s/ Jack P. Burden

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*Attorneys for Plaintiff*

*Attorneys for Defendant*

**ORDER**

IT IS SO ORDERED.

DATED: this 6th day of August, 2019.

  
UNITED STATES MAGISTRATE JUDGE

DATED this 5th day of August, 2019.

Respectfully Submitted,  
**BACKUS, CARRANZA & BURDEN**

By: /s/ Jack P. Burden

Jack P. Burden, Esq.

Jacquelyn Franco, Esq.

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Attorneys for Defendant *Albertson's LLC*

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## CERTIFICATE OF SERVICE

I am a resident of and employed in Clark County, Nevada. I am over the age of 18 years and not a party to the within action. My business address is: 3050 South Durango Drive, Las Vegas, Nevada, 89117.

On August 5, 2019, I served this document on the parties listed on the attached service list via one or more of the methods of service described below as indicated next to the name of the served individual or entity by a checked box:

**VIA U.S. MAIL:** by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid, in the United States mail at Las Vegas, Nevada. I am "readily familiar" with the firm's practice of collection and processing correspondence by mailing. Under that practice, it would be deposited with the U.S. Postal Service on that same day with postage fully prepaid at Las Vegas, Nevada in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing an affidavit.

**VIA FACSIMILE:** by transmitting to a facsimile machine maintained by the attorney or the party who has filed a written consent for such manner of service.

**BY PERSONAL SERVICE:** by personally hand-delivering or causing to be hand delivered by such designated individual whose particular duties include delivery of such on behalf of the firm, addressed to the individual(s) listed, signed by such individual or his/her representative accepting on his/her behalf. A receipt of copy signed and dated by such an individual confirming delivery of the document will be maintained with the document and is attached.

**BY E-MAIL:** by transmitting a copy of the document in the format to be used for attachments to the electronic-mail address designated by the attorney or the party who has filed a written consent for such manner of service.

**BY ELECTRONIC MEANS:** by electronically filing and serving with the court's vendor.

ATTORNEYS OF RECORD	PARTIES REPRESENTED	METHOD OF SERVICE
Sean K. Claggett, Esq. William T. Sykes, Esq. Geordan G. Logan, Esq. CLAGGETT & SYKES LAW FIRM 4101 Meadows Lane #100 Las Vegas, NV 89107 T: 702.655.2346 - F: 702.655.3763 <a href="mailto:sclaggett@claggettlaw.com">sclaggett@claggettlaw.com</a> <a href="mailto:wsykes@claggettlaw.com">wsykes@claggettlaw.com</a> <a href="mailto:glogan@claggettlaw.com">glogan@claggettlaw.com</a>	Plaintiff	<input type="checkbox"/> Personal service <input type="checkbox"/> Email service <input type="checkbox"/> Fax service <input type="checkbox"/> Mail service <input checked="" type="checkbox"/> Electronic Means

I declare that under penalty of perjury under the laws of the State of Nevada that the above is true and correct. I further declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Anne Raymond  
An employee of BACKUS, CARRANZA & BURDEN